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Attorneys for Defendants
EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., and FULLERTON
ORTHOPAEDIC SURGERY MEDICAL GROUP, INC.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:)

Jeffries, et al. v. Ameridose, et al.)
Docket No. 1:14-cv-12789-RWZ)

MOTION FOR LEAVE TO APPEAR BY TELEPHONE

COME NOW Defendants, Fullerton Orthopaedic Surgery Medical Group, Inc., Eugen D. Williams, M.D., and Linda Lui Luong, P.A., by and through their counsel of record, and hereby request that the Court grant them leave to appear by telephone at the Status Conference scheduled for July 28, 2016.

This Motion is made in response to Plaintiffs' motion to appear telephonically at the Status Conference [Dkt. 3006], of which Defendants just received notice earlier today. Counsel for Defendants intends to speak on the issue of the Court's Order to Show Cause regarding remand and transfer of certain cases, including *Jeffries, et al. v. Ameridose, et al.* [1:14-cv-12789-RWZ].

For the reasons set forth in Defendants' Response to Plaintiffs' Memorandum re the Court's Order to Show Cause re Remand and Transfer [Dkt. 2945], Defendants believe remand of *Jeffries, et al. v. Ameridose, et al.* [1:14-cv-12789-RWZ] is appropriate. If Plaintiffs' counsel intends to add any new information or argument in support of their request to delay remand, Defendants would like an opportunity to respond and be heard.

Therefore, Defendants, Fullerton Orthopaedic Surgery Medical Group, Inc., Eugen D. Williams, M.D., and Linda Lui Luong, P.A., respectfully request leave to appear telephonically at the Status Conference set for July 28, 2016.

Dated: July 27, 2016

LA FOLLETTE, JOHNSON, DEHAAS, FESLER & AMES

BY: 

DENNIS K. AMES, ESQ.

ROBERT J. IACOPINO, ESQ.

Attorneys for Defendants

EUGEN D. WILLIAMS, M.D.,

LINDA LUI LUONG, P.A., and

FULLERTON ORTHOPAEDIC

SURGERY MEDICAL GROUP, INC.

CERTIFICATE OF SERVICE

I, the undersigned, am employed in the County of Orange, State of California. I am over the age of eighteen years and not a party to the within action. I am employed with the law offices of La Follette, Johnson, De Haas, Fesler & Ames, 2677 N. Main Street, Suite 901, Santa Ana, California 92705.

On the below date, I electronically served a true and correct copy of the document entitled **MOTION FOR LEAVE TO APPEAR BY TELEPHONE** on all parties in MDL No. 2419 via CM/ECF.

I declare that I am employed in the office of an attorney admitted to practice before this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 27, 2016, at Santa Ana, California.



MONICA SALT